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May 6, 2021

Hon. Laura Taylor Swain  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**MEMO ENDORSED**

Re: *United States v. Constantinescu, et al.*  
Dkt. No.: 19-CR-651

Dear Judge Swain:

I am CJA counsel to Defendant Florian Martin. Mr. Martin is currently scheduled for a remote conference before Your Honor on May 21, 2021. I write to respectfully request a one-month adjournment of the scheduled conference date.

We continue to engage the government in plea negotiations and to review discovery, the most recent production of which we received last week. Mr. Martin, who remains in custody at the MCC New York, continues to review the contents of a 10TB hard drive of discovery which he recently gained access to. For these reasons, we are respectfully requesting a further one-month adjournment.

I have spoken with the government, by AUSA Elizabeth Hanft, who consents to this request.

Mr. Martin consents to the exclusion of time from the speedy trial clock from today through whichever date is convenient to the Court.

The Court's consideration is greatly appreciated.

Respectfully submitted,

/s/ Edward V. Sapone  
Edward V. Sapone, Esq.

Cc: Elizabeth Hanft, Esq.  
Assistant United States Attorney

Robert Sobelman, Esq.  
Assistant United States Attorney

Samuel Rothschild, Esq.  
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The pretrial conference scheduled to take place on May 21, 2021, is hereby adjourned to take place by remote means on June 23, 2021, at 9:00 a.m. The precise time and modality cannot be confirmed until late the week before, so counsel are requested to keep their calendars as open as possible from 9am to 2pm that day. The Court finds pursuant to 18 U.S.C. section 3161(h)(7)(A) that the ends of justice served by an exclusion of the time from today's date through June 23, 2021, outweigh the best interests of the public and the defendant in a speedy trial for the reasons stated above.

Docket entry 645 is resolved.

SO ORDERED.

5/6/2021

/s/ Laura Taylor Swain, Chief USDJ